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PRESTON
GATES ELLIS
& ROUVELAS
MEEDS

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SOL MOSHER
Senior Advisor
on Federal Affairs
and International Trade

* Admitted only in jurisdictions
other than the District of Columbia

August 18, 1993

VIA HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications
Commission
1919 M Street, N.W.
Washington, D.C.

RECEIVED

AUG 18 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Amendment of Part 90 of the Commission's Rules to
Adopt Regulations for Automatic Vehicle Monitoring
Systems, PR Docket No. 93-61, RM-8013

Dear Mr. Caton:

In accordance with Sections 1.1202, 1.1203, and 1.1206(a) of the Commission's Rules, this letter is to notify that Cynthia Czermer and Dennis Kahan of North American Teletrac and Location Technologies, Inc., doing business as Pactel Teletrac, met today concerning the above-captioned rulemaking proceeding with Chairman James H. Quello, Mr. Brian Fontes, Chief of Staff and Ms. Lauren J. Belvin, Acting Director, Legislative Affairs for the Federal Communications Commission. The content of the conversation was a discussion of the issues in the pending rulemaking. Two copies of the materials provided at the meeting are enclosed with this letter.

Please place this letter in the public record of this proceeding. Thank you.

Respectfully submitted,



John Longstreth

cc: Chairman James H. Quello
Mr. Brian F. Fontes
Ms. Lauren J. Belvin

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AUG 18 1993

INDEX OF LETTERS RELATING TO
FACTEL TELETRAC SERVICES

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

1. Multijurisdictional Criminal Apprehension Detail dated July 8, 1991.
2. Office of the Sheriff for the County of Los Angeles dated July 8, 1991.
3. District Attorney for the County of Los Angeles dated October 8, 1991.
4. Starlite Caterers dated November 18, 1991.
5. City of Farmington Hills dated November 20, 1991.
6. Joseph Koenig, Assistant Division Commander, Southeastern C.I.D. dated November 22, 1991.
7. Los Angeles County Office of Education dated November 22, 1991.
8. Record Transport, Inc., dated November 23, 1991.
9. Diversified Paratransit, Inc., dated November 25, 1991.
10. Superior Signal Service dated November 25, 1991.
11. EXECUTONE Information Systems, Inc., dated December 3, 1991.
12. Police Department for the City of Evanston, Illinois dated December 5, 1991.
13. Texas Department of Public Safety dated December 16, 1991.
14. U.S. Department of Justice, Federal Bureau of Investigation dated December 18, 1991.
15. Hernandez Cart Service, Inc., dated April 2, 1992.
16. Phillip Bailey dated April 2, 1992.
17. City of Coral Gables Police Department dated April 27, 1993.
18. United States Postal Service dated April 30, 1993.
19. U.S. Department of Justice, Federal Bureau of Investigation dated May 14, 1993.
20. U.S. Department of Justice, Drug Enforcement Administration received June 29, 1993.

**Burglary Apprehension Team • Cargo Criminal Apprehension Team • South Bay Burglary Team
South Central Burglary Team • West Criminal Apprehension Team • West Regional Burglary Team**
Carson, El Segundo, Hawthorne, Inglewood, Long Beach, Los Angeles County Sheriff's Office, Redondo Beach,
Rising Star, Rolling Hills Estates, Palmdale, Pomona, San Bernardino, San Diego, San Gabriel, San Jacinto, San Juan Capistrano,
U.S. Treasury Department, Bureau of Alcohol, Tobacco and Firearms



County of Los Angeles

Office of the Sheriff

Hall of Justice

Los Angeles, California 90012



SHERMAN BLOCK, SHERIFF

July 8, 1991

Mark Licht, President
Los Angeles Operations
International Teletrac Systems
9800 South La Cienega Boulevard, Suite 800
Inglewood, California 90301

Dear Mr. Licht:

I would like to take this opportunity to express my appreciation to you and Teletrac for the loan of a vehicle locator device during a recently concluded child molester surveillance operation. As you probably know by now, the suspect is in custody and has been charged with felony indecent exposure. He faces up to five years in state prison if convicted. Hopefully, no child will ever again have to be traumatized and injured by the actions of this individual.

Lieutenant Jim Harris of the Multijurisdictional Criminal Apprehension Detail (MCAD), has told me how effective the Teletrac device was and the key role it played in the success of this investigation. Given the type of individual that MCAD was following, a dawn to dusk surveillance would probably not have been successful without the use of a vehicle tracking device.

Sheriff Sherman Block has long been a supporter of "partnerships" between the private sector and law enforcement. When a partnership is created the combined resources of both entities are directed toward the common goal, and, more often than not, they are successful. Your assistance in this matter certainly bears out his belief.

Once again, thank you very much for your cooperation and for your support of this operation. We look forward to working with Teletrac in the future.

Sincerely,

SHERMAN BLOCK, SHERIFF


LARRY L. ANDERSON, ACTING CHIEF
FIELD OPERATIONS REGION II

cc: Stacey Black, General Manager
Barnet Fagel, Technical Support Manager



IRA REINER
DISTRICT ATTORNEY

**OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF LOS ANGELES**

**18000 CRIMINAL COURTS BUILDING
210 WEST TEMPLE STREET
LOS ANGELES, CALIFORNIA 90012
(213) 874-3501**

October 8, 1991

**Mr. Paul Fitzgerald
Account Executive
International Teletrac Systems
9800 La Cienega Boulevard, Suite 800
Inglewood, California 90301-4420**

Dear Mr. Fitzgerald:

The Los Angeles County District Attorney's Office extends its most sincere appreciation for the cooperation and assistance granted the Bureau of Investigation during a complex and sensitive arson case. It became apparent that a small city in Los Angeles County was experiencing an abnormal number of arson fires, and suspicion was directed at one individual who had virtually unlimited access to the city area. Because the paramount concern was for the safety of that city's citizens, your technical experience and proven accuracy was immediately sought for the following reasons.

The area of surveillance was less than 1.4 square miles, and the arson subject was operating during hours of light vehicle traffic. The subject's vehicle was in constant motion throughout the city. The possibility of the subject detecting the surveillance team forced the team to remain at peripheral posts for extended periods of time. A manpower-intensive operation was a virtual impossibility given the geographical conditions. It was necessary to constantly monitor the subject's activities from a distance, and maintain radio communication as to location and activity if the surveillance was to be successful.

Suffice it to say that the surveillance was successful, and the arson fires have stopped. The use of the Teletrac monitor was the cohesive ingredient which has facilitated the arrest of the

Mr. Paul Fitzgerald
Page Two
October 8, 1991

alleged arsonist and has enhanced the probability of a speedy and favorable prosecution. Again, the office extends its appreciation for your unselfish efforts, and especially the technical and training expertise provided by Barnett Fagel, Karen Birch, and Maria Howard.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Ira Reiner", written in a cursive style.

IRA REINER
District Attorney

10



Starlite Caterers

15739 VENTURA BOULEVARD • ENCINO, CALIFORNIA 91436 • TEL: (818) 789-7585

November 18, 1991

Michael Keesler
Business Manager
International Teletrac Systems, Inc.
9800 La Cienega Blvd.
Inglewood, CA 90301

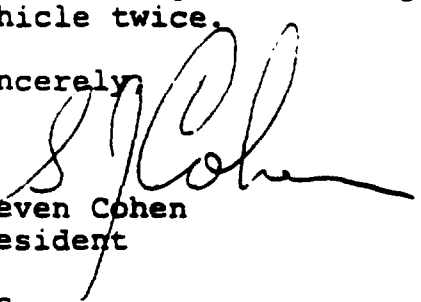
Dear Mr. Keesler:

Once again, I would like to personally thank your company for recovering my Porsche Carrera for the second time. When I brought the Teletrac stolen vehicle locator service I wondered if I would ever have a need for the system. But now that my car has been stolen and recovered with your assistance for the second time, I feel your system is absolutely indispensable.

I would like you to send me some brochures on your stolen vehicle locator service so I can let all my friends know how wonderful the Teletrac system is.

Once again, thank you for your assistance in recovering my vehicle twice.

Sincerely,


Steven Cohen
President

/as

Department of Police

William J. Dwyer

Chief of Police

313/473-9602

Miri J. Spencer

Deputy Chief of Police

313/473-9605

313/474-618
FAX 313/473-963



City of Farmington Hills

31655 ELEVEN MILE ROAD, FARMINGTON HILLS, MICHIGAN 48336-1170

November 20, 1991

**Mr. Charles Shropshire
International Teletrac Systems, Inc.
30303 Country Club Drive, Ste. A-11
Farmington Hills, MI 48331**

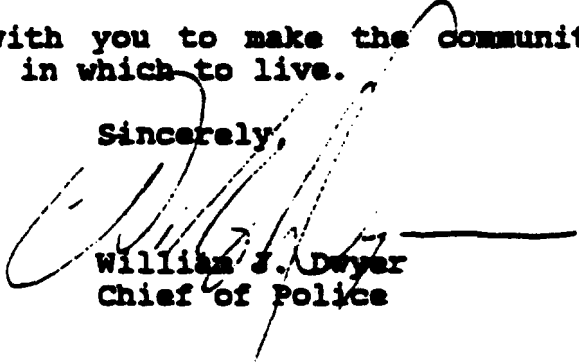
Dear Mr. Shropshire:

Michigan has the dubious honor of being one of the leaders in a new criminal pastime called "carjacking." A thief stops a driver at gun point, forces the driver out of the vehicle, and then drives off. I truly believe your system will assist Michigan law enforcement agencies in arresting those persons responsible for carjackings as it has already assisted California police in arresting, convicting, and incarcerating at least one carjacker.

In Farmington Hills we are also using the system to assist our Department, and the City, with 9-1-1 calls. With the assistance of Teletrac, our dispatchers immediately have the capability of locating the site of a distress call through the mapping system, which also provides immediate identity as to which patrol car is in closest proximity to respond to the call.

We look forward to working with you to make the community of Farmington Hills a safer place in which to live.

Sincerely,


**William J. Dwyer
Chief of Police**

November 22, 1991

Mr. Charles Shropshire
International Teletrac Systems, Inc.
39303 Country Club Drive, Ste. A-11
Farmington Hills, MI 48331

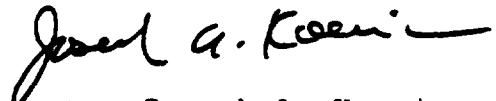
Dear Charles:

As you are well aware, we successfully used the Teletrac system recently on a narcotics trafficking investigation. The capabilities of Teletrac were just what we needed to ensure a successful conclusion to that very important case. We thank you for assisting us.

I understand that Teletrac is restricted to using its system in just the 313 area code. It can certainly be stated that area code and geographical boundaries are inconsequential to the criminal element. Any illicit drug trafficker doesn't stop at the 313 area code boundary to pause and reflect.

Investigative agencies need sophisticated equipment, like Teletrac, to successfully stay abreast of criminal enterprises. Police agencies can't be restricted by boundaries, nor should technology.

Sincerely,



Inspector Joseph A. Koenig
Assistant Division Commander
Southeastern C.I.D.
18050 Deering
Livonia, MI 48152
525-4149

JAK/la

ANDREWS OFFICE PRODUCTS CAPITOL HEIGHTS, MD (K)



Los Angeles County Office of Education

Stuart E. Gethold
Superintendent

November 22, 1991

Los Angeles County
Board of Education

Frank J. Alderete
President

Barbara G. Pieper
Vice President

Lewis P. Bohler, Jr.

Jeanne Breunig

Manuel Gallegos

Max E. Ragland

Michaelene D. Wagner

Mark Rich
Senior Account Executive
International Teletrac Systems
9800 La Cienega Boulevard, Suite 800
Inglewood, CA 90301

Dear Mr. Rich:

Following our recent telephone conversation I reflected upon the remarkable working relationship the Los Angeles County Schools has enjoyed with Teletrac for more than two years. I was convinced early on in our review of Teletrac that an accurate and cost effective vehicle location system could play an important role in the school bus industry. Today, Teletrac continuously exceeds my expectations for a vehicle location system.

Transportation services the county office provides to school districts throughout the 4,000 square mile area of Los Angeles county has improved significantly since we've installed the Teletrac system. This is due in large part to the fact that we know the exact location of contract school buses at all times.

Our emergency planning for earthquakes and other disasters has been aided by utilizing the Teletrac system, giving us the exact location of our buses in the event of an emergency.

Additionally, transporting handicapped children is a large part of our service. We are able to predict accurate estimated times of arrival for pick-up so parents do not need to leave their children waiting for buses. We are also able to report to parents the time of drop off.

Finally, the Teletrac system has assisted us in dealing with a critical problem that plagues our industry, school bus driver turnover. In the first weeks of employment, new drivers routinely get lost. By using the Teletrac system in conjunction with our two way radios, we are able to give new drivers directions on how to get to a school or pick-up point.

Sincerely,

Charles Devlin
Transportation Officer

CD:hs

RECORD TRANSPORT, INC.
2065 Ross Street
Vernon, California, 90058
(213)231-9141

November 23, 1991

Ned Carey
Account Executive
International Teletrac Systems, Inc.
9800 La Cienega Blvd., Suite 800
Inglewood, CA 90301

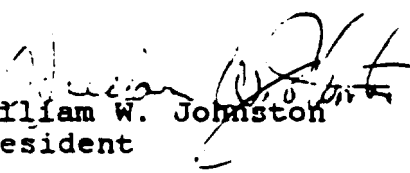
Dear Mr. Carey:

We have been using Teletrac for over 10 months as a vehicle location system with a primary application of security and route tracking of our mobile equipment. As you know Ned, we transport some pretty "high risk" freight on a regular basis and have experienced some rather costly cargo losses in the past.

Shortly after activating the Teletrac System, as part of our continuing security efforts, we did experience another high-jacking of one of our tractor/trailer units. While monitoring one of our units which was enroute back to our Terminal, our dispatcher was able to determine the vehicle was several miles south of where it should have been. The Los Angeles Police were notified of the suspected high-jacking and, acting on information we were able to supply through continued monitoring, they were able to locate the vehicle and driver. We are convinced this recovery would not have been possible without the monitoring/tracking capability of the Teletrac System.

We wanted you to know that not only were we able to recover the truck and cargo but, even more importantly, our driver was released unharmed.

Sincerely,


William W. Johnston
President

DIVERSIFIED PARATRANSIT, INC.

1400 EAST MISSION BOULEVARD
POMONA, CALIFORNIA 91768
(714) 862-1318 • (714) 866-1138

November 25, 1991

Mr. Mark Rich,
Sr. Account Executive
International Teletrac Systems, Inc.
Inglewood, Ca. 90301

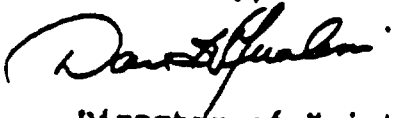
Dear Mr. Rich:

Diversified Paratransit operates bus services in the Los Angeles area with the purpose of giving rides to elderly and handicapped individuals. Our service includes bus transportation for Regional Centers, nursing homes and Dial-A-Ride for the elderly individuals.

We utilize the Teletrac system for the purpose of providing better service to our clients. With this system we can locate the closest vehicle to a pick up point, saving waiting time for our clients. Also by knowing the location of our vehicles we can accurately quote estimated times of arrival for programs or relatives.

We just wanted to let you know how valuable your system has been in improving the lives and well-being of our elderly and handicapped customers

Sincerely,



Director of Maintenance



SUPERIOR SIGNAL SERVICE

7224 SCOUT AVENUE, BELL GARDENS, CALIFORNIA 90201 • (213) 927-4488
FAX (213) 928-9689 • LICENSE NO. 283204 • FED TAXPAYER ID NO. 95-2847733

November 25, 1991

Mr. Ned Carey
Account Executive
International Teletrac Systems Inc.
9800 La Cieniga Blvd., Suite 800
Inglewood, Ca 90301

Dear Mr. Carey,

It is indeed a pleasure to inform you of some recent developments as to the benefits we have realized from the use of the Teletrac System. I contacted our insurance company and inquired about possible savings we might be entitled to as a result of the tracking capability of Teletrac.

In September the Teletrac system was demonstrated to our insurance broker. The benefits were described in full as to how Teletrac has enhanced our ability to not only track our vehicles but to document the information as well. We indemnify all of our clients with respect to our operations and compliance to our contracts. Our broker was particularly interested in the ability to prove that our people were where they are supposed to be when they are supposed to be there. Due to the emergency public service nature of our business, this is our most serious exposure.

On November 1st, our broker quoted the new rates for our insurance. Due almost exclusively to Teletrac and our ability to document the activities of our vehicles, we realized a savings on not only the automotive portion of the insurance but a significant consideration was given to the liability section as well. In an environment where costs are constantly rising, we have realized savings of over \$ 6,000 per year on our general insurance premiums.

I am sure that as time goes on, we will continue to experience benefits from the Teletrac system, so I thank you in advance for those benefits.

Respectfully,

H. Chet Galland
President & General Manager

HCG/pl



EXECUTONE Information Systems, Inc.
P.O. Box 1258
2727 Palladium Place
City of Industry, CA 91749
Phone: 213/692-7531
Fax: 213/695-3020

December 3, 1991

**Mr. John Polcari, Account Executive
INTERNATIONAL TELETRAC SYSTEMS, INC.
9800 La Cienega Boulevard, Suite 800
Inglewood, CA 90301**

Dear Mr. Polcari,

Teletrac has greatly helped EXECUTONE improve the efficiency of our business. One such example is the improvement in our ability to service our customers with replacement parts. EXECUTONE keeps a computerized record of our vehicles' replacement parts inventory. By using the Teletrac System, we can locate vehicles that carry a needed part and establish which one is nearest to a customer. This allows us to provide timely response to a customer having problems with their phone system.

In addition, fuel efficiency of our fleet has increased by reducing the amount of miles the vehicles travel: our backlog is reduced by being able to dispatch service vehicles more efficiently. The Teletrac system allowed us to be a more conscious corporate system by reducing drive time and fuel usage of our fleet vehicles and increasing customer service.

Sincerely,

A handwritten signature in dark ink, appearing to read "Gerald N. Quindt". The signature is fluid and cursive, with the first name "Gerald" being more prominent.

**Gerald N. Quindt
Operations Manager**

JQ:kaw